

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

**IN RE: NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION LITIGATION**

MDL No. 2492

Master Docket No. 13-cv-09116

Judge John Z. Lee

Magistrate Judge Geraldine Soat Brown

PLAINTIFFS' MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Plaintiffs, by and through their attorneys, respectfully request leave to file documents under seal ("Motion for Leave") and state the following:

1. Simultaneously with this Motion for Leave, Plaintiffs have filed their Renewed Motion to Add Non-Contact Sports Plaintiffs and Class Representatives and the redacted version of the Memorandum in Support ("Motion").

2. Plaintiffs' Motion is supported by documents quoting and/or citing to information that have been designated "CONFIDENTIAL" under the Agreed Protective Order dated March 7, 2012 in *Arrington v. National Collegiate Athletic Association*, No. 11-cv-06356 (Dkt. No. 57). The documents that contain information designated as Confidential include:

- a. Plaintiff's Memorandum in Support of the Motion; and
 - b. Exhibits 4 and 5 to the Declaration of Steve W. Berman ("Berman Declaration").
3. Plaintiffs have simultaneously filed public-record versions of the documents with the Confidential Information redacted. *See* Agreed Confidentiality Order, ¶ 7(b) (requiring the

electronic filing of “a public-record version of the document with the Confidential Information excluded”).

4. Accordingly, Plaintiffs respectfully request leave to file unredacted copies of the Memorandum in Support of the Motion, and Exhibits 4 and 5 to the Berman Declaration under seal.

WHEREFORE, Plaintiffs respectfully request that the Court grant their Motion For Leave To File Documents Under Seal, and grant such other and further relief as this Court deems appropriate.

Dated: December 15, 2013

Respectfully submitted,

By: /s/ Steve W. Berman
Steve W. Berman
steve@hbsslaw.com
HAGENS BERMAN SOBOL SHAPIRO LLP
1918 Eighth Avenue, Suite 3300
Seattle, WA 98101
206.623.7292
Fax: 206.623.0594

Elizabeth A. Fegan
beth@hbsslaw.com
Thomas E. Ahlering
toma@hbsslaw.com
HAGENS BERMAN SOBOL SHAPIRO LLP
1144 W. Lake Street, Suite 400
Oak Park, IL 60301
708.628.4949
Fax: 708.628.4950

Joseph J. Siprut
jsiprut@siprut.com
Gregg M. Barbakoff
gbarbakoff@siprut.com
SIPRUT PC
17 North State Street
Suite 1600
Chicago, IL 60602
312.236.0000
Fax: 312.878.1342

Co-Lead and Settlement Class Counsel

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on December 15, 2014, a true and correct copy of the foregoing was filed electronically via CM/ECF, which caused notice to be sent to all counsel of record.

By: /s/ Steve W. Berman